

Karolina Karpov
305 Mill Street, Apt 2A
Poughkeepsie, N.Y. 12601
(845) 559-9010

Clerk of Court
U.S. District Court, District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, DE 19801-3569

JAN 24 2013

LG

January 21, 2013

Re: Karolina Karpov v. Vladimir Karpov and Svetlana Karpov, CA No. 12-1411-GMS

Hon. Clerk of Court,

I am the pro se plaintiff in the case shown above.

This letter is my proof of service of the attached signed subpoenas upon the Defendants for their information.

I forwarded a copy of the two subpoenas by mail to Svetlana Karpov at 482 West Chestnut Hill Road, Newark DE 19713.

I forwarded a copy of the two subpoenas by mail to Vladimir Karpov at the James T. Vaughn Correctional Center 1181 Paddock Road Smyrna, Delaware 19977.

Affidavit of service of the two subpoenas shall be filed once service upon each recipient identified in the subpoena is executed.

Thank you.


KAROLINA KARPOV

Enclosures: Subpoena to State Prosecutor
Subpoena to Vladimir and Svetlana Karpov

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

-----		C.A. No. 12-1411-GMS
KAROLINA KARPOV,)	
Plaintiff,)	
)	SUBPOENA TO PRODUCE
-v-)	DOCUMENTS, INFORMATION, OR
)	OBJECTS OR TO PERMIT
VLADIMIR KARPOV and SVETLANA)	INSPECTION OF PREMISES IN A
KARPOV,)	CIVIL ACTION
Defendants.)	

TO:
SVETLANA KARPOV
482 West Chestnut Hill Road
Newark DE 19713

VLADIMIR KARPOV
I.D. No. 0706009021
James T. Vaughn Correctional Center
1181 Paddock Road
Smyrna, Delaware 19977

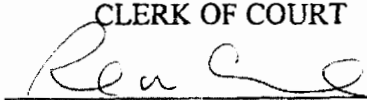
YOU ARE COMMANDED to produce at the Chambers of Hon. GREGORY M SLEET.
U.S. District Court, District of Delaware, J. Caleb Boggs Federal Building, 844 N. King
Street, Room 4324, Unit 19, Wilmington, DE 19801-3569 on or before February 28,
2013 the following documents, electronically stored information, or objects, and permit
their inspection and copying:

1. All bank account statements from the year 1999 to 2007, checking and
savings, personal and business under you name, your agent's name or your assign's name.
2. All real property deeds in your name, your agent's name or your assign's
name held by you since 1999 to 2007.

The purpose of this subpoena is to determine Plaintiff's share of Defendant's assets
acquired during the period of the sexual slavery of the Plaintiff, KAROLINA KARPOV.

The provisions of Federal Rule of Civil Procedure 45(c) relating to your production as a
person subject to a subpoena and the potential consequences of not doing so are attached.

Date: JAN 11 2013

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The address and telephone number of KAROLINA KARPOV who issued this subpoena
is 305 Mill Street, Apt 2A, Poughkeepsie, N.Y. 12601, (845) 559-9010.

AO 88B (Rev. 06/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

This subpoena for (name of individual and title, if any) _____
was received by me on (date) _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____
_____ on (date) _____; or

☐ I returned the subpoena unexecuted because: _____
_____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

*Server's signature*_____
*Printed name and title*_____
Server's address

Additional information regarding attempted service, etc:

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)**(c) Protecting a Person Subject to a Subpoena.**

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the issuing court must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person — except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information;

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or

(iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(d) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

-----		C.A. No. 12-1411-GMS
KAROLINA KARPOV,)	
)	
Plaintiff,)	
)	
-v-)	SUBPOENA TO PRODUCE
)	DOCUMENTS, INFORMATION, OR
)	OBJECTS OR TO PERMIT
VLADIMIR KARPOV and SVETLANA)	INSPECTION OF PREMISES IN A
KARPOV,)	CIVIL ACTION
)	
Defendants.)	

TO:

Department of Justice, New Castle County
820 North French Street, Wilmington, DE 109801
tel (302) 577-8500, fax (302) 577-2496

State vs. VLADIMIR KARPOV, I.D. No: 0706009021

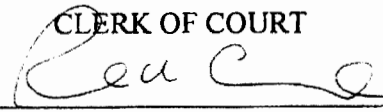
YOU ARE COMMANDED to produce at the Chambers of Hon. GREGORY M SLEET.
U.S. District Court, District of Delaware, J. Caleb Boggs Federal Building, 844 N. King
Street, Room 4324, Unit 19, Wilmington, DE 19801-3569 on or before February 28,
2013 the following documents, electronically stored information, or objects, and permit
their inspection and copying:

1. All records, files, psychological reports and video/audio records of the
criminal prosecution of STATE vs. VLADIMIR KARPOV, I.D. No: 0706009021.

The purpose of this subpoena is to produce relevant evidence of the culpability of
defendant VLADIMIR KARPOV in the sexual enslavement of the Plaintiff child
KAROLINA KAPROV. Additionally, contained within this file are forensic evaluations,
forensic notes and video/audio recordings that provide relevant evidence as to Plaintiff's
psychological damages at the time of VLADIMIR'S arrest and prosecution.

The provisions of Federal Rule of Civil Procedure 45(c) relating to your production as a
person subject to a subpoena and the potential consequences of not doing so are attached.

Date: JAN 11 2013

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The address and telephone number of KAROLINA KARPOV who issued this subpoena
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This subpoena for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of

\$ _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

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Marina Kapov
305 Mill Street
Apt 2A.
Fayetteville NF 28401



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